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22 *Attorneys for Defendant Nature's Bakery, LLC*

23 UNITED STATES DISTRICT COURT

24 DISTRICT OF NEVADA

25 TURKIYE IHRACAT KREDI BANKASI,
26 A.S.,

Case No. 3:20-cv-00330-LRH-CLB

27 Plaintiff,

28 vs.

NATURE'S BAKERY, LLC F/K/A BELLA
FOUR BAKERY, INC.,

Defendant.

29 **STIPULATION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**
(First Request)

30 Defendant Nature's Bakery, LLC, and Plaintiff Turkiye Ihracat Kredi Bankasi, A.S., by
31 and through their respective counsel of record, stipulate and agree as follows:

1. Plaintiff filed its Complaint (ECF No. 1) on June 4, 2020.

2. The parties dispute the date of service. Plaintiff filed a sworn to Proof of Service
3 that indicates Defendant was served on June 8, 2020 (ECF No. 10). Assuming service occurred
4 on June 8, 2020, the deadline to respond to the Complaint was June 29, 2020.

5. Defendant, on the other hand, contends that service did not occur until June 10,
6 2020. Assuming service occurred on June 10, 2020, the deadline for Defendant to respond to the
7 Complaint is July 1, 2020.

8. On June 29, 2020, Defendant's counsel requested additional time to respond to
9 Plaintiff's Complaint because Nevada counsel has only recently been retained and counsel needs
10 additional time to fully research and evaluate the factual allegations in the Complaint before filing
11 Defendant's response to the Complaint.

12. On June 30, 2020, Defendant's counsel provided Plaintiff's counsel with an initial
13 draft of this stipulation. Through this process, the parties learned about the dispute regarding the
14 date of service.

15. On July 1, 2020, counsel for the parties further conferred about Defendant's
16 request for an extension of time and Plaintiff agreed to Defendant's request subject to an agreeable
17 stipulation filing.

18. It is Defendant's position that this Stipulation is timely filed based on a June 10,
19 2020, date of service.

20. However, assuming *arguendo* that service occurred on June 8, 2020, Defendant
21 respectfully submits that it has demonstrated excusable neglect by not submitting this stipulation
22 by June 29, 2020. *See* LR IA 6-1.

23. In light of the circumstances, the parties stipulate that Defendant may have up to
24 and including July 15, 2020, to respond to the Complaint.

25. This stipulation is being filed in good faith for the reasons stated above and not for
26 the purpose of delay.

1 11. This is the first stipulation between Plaintiff and Defendant to extend the time for
2 responding to the Complaint.

3 Dated this 1st day of July, 2020.

4 DICKINSON WRIGHT PLLC

5 _____
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30 *Attorneys for Defendant Nature's Bakery, LLC*

31 Dated this 1st day of July, 2020.

32 BLUESTONE LAW, LTD.

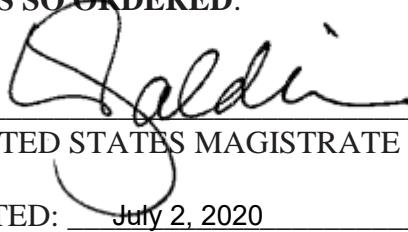
33 _____
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50 *Attorneys for Plaintiffs Turkiye Ihracat Kredi
51 Bankasi, A.S.*

52 ***

53 **IT IS SO ORDERED:**

54 
55 _____
56 UNITED STATES MAGISTRATE JUDGE
57 _____
58 DATED: July 2, 2020

CERTIFICATE OF SERVICE

I certify that I am an employee of DICKINSON WRIGHT, PLLC and that on this date, pursuant to Federal Rule of Civil Procedure 5(b), I am serving a true and correct copy of the attached **STIPULATION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT** on the parties as set forth below:

XXX CM/ECF Electronic Notification addressed as follows:

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DATED this 1st day of July, 2020.

/s/ Cindy S. Grinstead
An Employee of DICKINSON WRIGHT PLLC